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November 3, 2022

**VIA ECF**

Honorable Roanne L. Mann, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: ***Paschalidis v. The Airline Restaurant Corp., et al.***  
**Civil Action No. 1:20-cv-02804-LDH-RLM**

Dear Judge Mann:

We represent Plaintiff Isaac Paschalidis (“Plaintiff”) in the above referenced matter. This joint status letter is submitted in accordance with the Order entered on September 8, 2022 (ECF No. 55).

On October 26, 2022, the parties engaged in Court ordered Mediation. Although the case was not settled, the parties adjourned the Mediation in order for counsel to engage in discussions as to whether a global settlement of all issues in both the Federal and State lawsuits were probable. If such a settlement were probable, the parties tentatively scheduled a second mediation session to be conducted in mid-December. If not probable, the parties were to inform the Mediator. The parties anticipate engaging in such discussions this week.

The status with respect to fact discovery is as follows:

- The parties are discussing a proposed Discovery Confidentiality Order that would satisfy the concerns of all parties and will be in accordance with the Court’s Memorandum and Order entered on October 17, 2022 (ECF No. 65);
- Plaintiff will meet and confer with Defendants as to the basis for designating certain information as Attorneys’ Eyes Only;

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- Plaintiff will meet and confer with Defendants as to the basis for Defendants' objections to produce certain financial related documents with respect to the individual Defendants;
- The parties will discuss dates to conduct depositions; and
- The parties do not anticipate needing expert discovery.

Thank you for your continued attention to and consideration of this matter.

Respectfully submitted,



Eric Magnelli

EM:

Cc: All Counsel of Record (Via ECF)